

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
v.)
SUKITA TEMAYA HAMILTON)
CR. NO. 2:06-cr-274-MHT-CSC

United States's Motion for Downward Departure for Substantial Assistance

The United States moves this Court to reduce Defendant Sukita Temaya Hamilton's offense level by two-levels based on Hamilton's substantial assistance in this case. As grounds for this Motion, the United States notes:

1. Hamilton has cooperated with the United States. During her cooperation, Hamilton informed the United States of additional Hurricane Katrina fraud. Hamilton was asked to and did provide this information to the most recent Grand Jury in this District. The United States is hopeful that this information will lead to the indictment of several other Hurricane Katrina fraudsters.

2. Hamilton also provided information that was instrumental in causing a defendant to plead guilty in the case of *United States v. Willis, et al.*, 06-cr71-MEF (M.D. Ala. 2007).

3. The United States submits that to the best of its knowledge Hamilton has been truthful with federal investigators. As part of the plea agreement, Hamilton has waived her right to appeal and/or collaterally attack the sentence imposed in this case. Therefore, United States asks this Court to depart two-levels under Guideline § 5K1.1 based upon Hamilton's

substantial assistance.

Respectfully submitted this the 17th day of April, 2007.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334) 223-7280
Fax: (334) 223-7135
E-mail: christopher.a.snyder@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Joseph Van Heest.

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney